

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SLAWOMIR CELINSKI,)
)
Plaintiff,)
)
v.) Case No.: 08 CV 4126
)
)
JONATHAN A. MIRSKI and) Judge Manning
UNI-SYSTEMS, INC.) Magistrate Valdez
)
Defendants.)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on August 19, 2008 at 11:00 a.m., we shall present the attached Defendants, Jonathan A. Mirski and Uni-Systems, Inc.'s Motion for an Extension of Time until August 19, 2008 to file an Answer to Count I of Plaintiff's Complaint at Law before the Honorable United States District Judge Manning in Courtroom 2125 at the United States District Courthouse, Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois 60604. A true and correct copy of the motion has been served upon you.

/s/ Kevin W. Doherty
Kevin W. Doherty

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been served on:

kdoran@doranmedina.com

j.t.m.moran@gmail.com

by e-filing this 11th day of August, 2008.

/s/ Kevin W. Doherty
Kevin W. Doherty

Kevin W. Doherty (ARDC No.: 3128844)
Brian T. Ginley (ARDC No.: 6281463)
DOHERTY & PROGAR LLC
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SLAWOMIR CELINSKI,)
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Plaintiff,)
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v.) Case No.: 08 CV 4126
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JONATHAN A. MIRSKI and) Judge Manning
UNI-SYSTEMS, INC.) Magistrate Valdez
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)
Defendants.)

**MOTION FOR EXTENSION OF TIME TO ANSWER COUNT I OF PLAINTIFF'S
COMPLAINT AT LAW**

NOW COME the Defendants, JONATHAN A. MIRSKI and UNI-SYSTEMS, INC., by and through their attorneys, KEVIN W. DOHERTY, BRIAN T. GINLEY, and DOHERTY & PROGAR, LLC, and for their Motion for Extension of Time to Answer Count I of Plaintiff's Complaint at Law, states as follows:

1. On July 21, 2008, the Defendants' former attorneys from SmithAmundsen LLC removed this matter to Federal Court.
2. On July, 28, 2008, the Defendants' former attorneys from SmithAmundsen LLC filed an Agreed Motion for Extension of Time to answer or otherwise plead to Plaintiff's Complaint at Law.
3. On August 4, 2008, the Honorable Blanche M. Manning granted the Defendants' Agreed Motion for Extension of Time to answer or otherwise plead to Plaintiff's Complaint at Law. The Defendants were given until August 11, 2008 to answer or otherwise plead to Plaintiff's Complaint at Law.

4. That KEVIN W. DOHERTY, BRIAN T. GINLEY, and DOHERTY & PROGAR, have recently been retained to represent the interests of the Defendants, JONATHAN A. MIRSKI and UNI-SYSTEMS, INC.

5. That Defendants' new counsel needs a short period of additional time to investigate the allegations of the Plaintiff's Complaint at Law and are seeking an additional eight (8) days until August 19, 2008 to answer or otherwise plead to the Plaintiff's Complaint at Law.

WHEREFORE, the Defendants, JONATHAN A. MIRSKI and UNI-SYSTEMS, INC., pray that this Honorable Court grant their Motion for Extension of Time to Answer Count I of Plaintiff's Complaint at Law and allow the Defendants until August 19, 2008 to file their Answers to Count I of Plaintiff's Complaint at Law.

Respectfully submitted,

JONATHAN A. MIRSKI and UNI-SYSTEMS,
INC.

By: /s/ Kevin W. Doherty

Kevin W. Doherty
One of their Attorneys

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